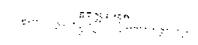


FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463



2015 AUG 19 AM 9: 04

SENSITIVE

MEMORANDUM

TO:

The Commission

FROM:

Daniel A. Petalas

Associate General Counsel for Enforcement

Kathleen M. Guith

Deputy Associate General Counsel for Enforcement

BY:

Mark Allen

Assistant General Counsel

Tanya Senanayake 105

Attorney

SUBJECT:

MUR 6943 (Republican Party of Orange County)

Pre-Probable Cause Conciliation Agreement

Attached is a conciliation agreement signed by counsel on behalf of the Republican Party of Orange County ("Committee") and Jeffrey Lalloway in his official capacity as treasurer (collectively "Respondents"). See Attachment 1 (Signed Conciliation Agreement). This agreement, which we recommend the Commission accept, would settle violations of 52 U.S.C. §§ 30104(b) and 30125(b) stemming from the Committee's failure to report debts totaling \$56,089 during the 2010 election cycle and improperly spending \$73,465 on voter registration activities using Levin funds transferred to it from the California Republican Party. See Certification, MUR 6943 (June 17, 2015) (finding reason to believe that Respondents violated

52 U.S.C. §§ 30104(b) and 30125(b) and authorizing pre-probable cause conciliation).

We recommend that the Commission accept the attached signed conciliation agreement with the Respondents containing these limited changes and close the file in this matter.

FEDERAL SECTION COMMISSION

AUG 19 AN 8:51

2. Approve the appropriate letter.

1. Accept the attached signed conciliation agreement with Republican Party of Orange

County and Jeffrey Lalloway in his official capacity as treasurer.

RECOMMENDATIONS

- 3. Close the file.